

FILED

FEB 12 2019

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. S3-4:14CR00088 RWS (SPM)
)
DIONNE LAMONT GATLING,)
a/k/a "Cuffie," "Cuffy,")
)
Defendant.)

SUPERSEDING INFORMATION

COUNT I

The United States of America charges that:

Beginning at an exact time unknown, but including 2009, and continuing thereafter to July 16, 2015, in the Eastern District of Missouri and elsewhere, the defendant,

**DIONNE LAMONT GATLING,
a/k/a "Cuffie," "Cuffy,"**

did knowingly and willfully conspire, combine, confederate and agree with persons known and unknown, including ANDRE ALPHONSO RUSH, a/k/a "Dirty," "Dre," LORENZO RALPH GIBBS, a/k/a "Tall," "Reno," and "Dog," and TIMOTHY LAMONT RUSH, a/k/a "Professor," to commit offenses against the United States, to wit: to distribute and possess with intent to distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846; and

The amount of cocaine involved in the conspiracy and attributable to defendant **DIONNE LAMONT GATLING**, a/k/a "Cuffie," "Cuffy," as a result of his own conduct, and the conduct of other conspirators, known or reasonably foreseeable to him, is five kilograms or more of a mixture or substance containing a detectable amount of cocaine, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(ii)(II).

COUNT II

The United States of America further charges that:

Beginning at an exact time unknown, but including 2009, and continuing thereafter to July 16, 2015, in the Eastern District of Missouri and elsewhere, the defendant,

**DIONNE LAMONT GATLING,
a/k/a "Cuffie," "Cuffy,"**

did knowingly and willfully conspire, combine, confederate and agree with each other and other persons known and unknown, including ANDRE ALPHONSO RUSH, a/k/a "Dirty," "Dre," LORENZO RALPH GIBBS, a/k/a "Tall," "Reno," and "Dog," and TIMOTHY LAMONT RUSH, a/k/a "Professor," to commit offenses against the United States, to wit: to distribute and possess with intent to distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846; and

The amount of heroin involved in the conspiracy and attributable to defendant **DIONNE LAMONT GATLING**, a/k/a "Cuffie," "Cuffy," as a result of his own conduct, and the conduct of other conspirators, known or reasonably foreseeable to him, is one kilogram or more of a mixture or substance containing a detectable amount of heroin, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(i).

COUNT III

The United States of America further charges that:

Beginning at an exact time unknown, but including the period between February 4, 2013, and February 7, 2013, in the Eastern District of Missouri and elsewhere, the defendant,

**DIONNE LAMONT GATLING,
a/k/a "Cuffie," "Cuffy,"**

acting with LORENZO RALPH GIBBS, a/k/a "Tall," "Reno," and "Dog," and TIMOTHY LAMONT RUSH, a/k/a "Professor," did knowingly and intentionally attempt to commit the following offense against the United States: to knowingly and intentionally possess with the intent to distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and that one or more of the defendants committed a substantial step in furtherance thereof.

All in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2; and

The amount of mixture or substance containing a detectable amount of heroin involved in the offense attributable to defendant, **DIONNE LAMONT GATLING, a/k/a "Cuffie," "Cuffy,"** was in excess of one kilogram, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(i).

COUNT IV

The United States of America further charges that:

Beginning at an exact time unknown, but including the period between February 13, 2013, and February 18, 2013, in the Eastern District of Missouri and elsewhere, the defendant,

**DIONNE LAMONT GATLING,
a/k/a "Cuffie," "Cuffy,"**

acting with ANDRE ALPHONSO RUSH, a/k/a "Dirty," "Dre," LORENZO RALPH GIBBS, a/k/a "Tall," "Reno," and "Dog," and TIMOTHY LAMONT RUSH, a/k/a "Professor," did knowingly and intentionally attempt to commit the following offense against the United States: to knowingly and intentionally possess with the intent to distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and that one or more of the defendants committed a substantial step in furtherance thereof.

All in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2; and

The amount of mixture or substance containing a detectable amount of cocaine involved in the offense attributable to defendant **DIONNE LAMONT GATLING**, a/k/a "Cuffie," "Cuffy," was in excess of five kilograms, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(ii)(II).

COUNT V

The United States of America further charges that:

Between April 5, 2010, and May 2, 2013, in St. Louis City, Missouri, within the Eastern District of Missouri, and elsewhere, the defendant,

**DIONNE LAMONT GATLING,
a/k/a "Cuffie," "Cuffy,"**

aiding and abetting and acting with others, known and unknown to the United States, including ANDRE ALPHONSO RUSH, a/k/a "Dirty," "Dre," did knowingly possess one or more firearms in furtherance of the commission of drug-trafficking crimes which may be prosecuted in a court of the United States, to-wit: Conspiracy to distribute and to possess with the intent to distribute a controlled substance, cocaine, as charged in Count I; and Conspiracy to distribute and to possess with the intent to distribute a controlled substance, heroin, as charged in Count II; Attempt to

possess with the intent to distribute a controlled substance, heroin, as charged in Count III; and Attempt to possess with the intent to distribute a controlled substance, cocaine, as charged in Count IV, herein, and in the course of such violations, caused the deaths of (a) Theodis Howard; and (b) Terrance Morgan, through the use of one or more firearms.

In violation of Title 18, United States Code, Sections 2, 924(c)(1)(A), and 924(j).

And in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendant, aiding and abetting and acting with others, including ANDRE ALPHONSO RUSH, a/k/a "Dirty," "Dre," with malice aforethought, unlawfully killed (a) Theodis Howard, on or about April 5, 2010; and (b) Terrance Morgan, on or about May 2, 2013; defendant, aiding and abetting and acting with others, including ANDRE ALPHONSO RUSH, a/k/a "Dirty," "Dre," caused each death by shooting each victim with one or more firearms, willfully, deliberately, maliciously, and with premeditation, thereby making this offense punishable under Title 18, United States Code, Sections 2 and 924(j).

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney


MICHAEL A. REILLY, #45908MO
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Assistant United States Attorneys

UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, Michael A. Reilly, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing Superseding Information is true as I verily believe.

Michael A. Reilly

MICHAEL A. REILLY, #43908MO
Assistant United States Attorney

Subscribed and sworn to before me this 11th day of February, 2019.

Gregory J. Lashier
CLERK, U.S. DISTRICT COURT

By: *Michael Daines*

DERUTY CLERK